

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LEON D. BLACK,

Plaintiff,

Case No.:
1:21-cv-08824-PAE

-against-

GUZEL GANIEVA, WIGDOR LLP,
AND JOHN DOES 1-3,

Defendants.
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DECLARATION OF MAX GERSHENOFF

Max Gershenoff, pursuant to 28 U.S.C. § 1746, hereby declares the truth of the following:

1. I am a partner with the law firm of Rivkin Radler LLP, counsel for Defendant Wigdor LLP (“Wigdor”) in this action. I have personal knowledge of the facts set forth in this declaration, and would testify as to them in a court of law if required to do so.

2. I respectfully submit this declaration in support of Wigdor’s motion for sanctions, pursuant to Fed. R. Civ. P. 11.

3. Attached hereto as Exhibit “1” is a copy of Guzel Ganieva’s first amended complaint in Ganieva v. Black, Index No. 155262/2021 (Sup. Ct. N.Y. Cty.)

4. Attached hereto as Exhibit “2” is a copy of the engagement agreement as produced by the plaintiff, Guzel Ganieva, in Ganieva v. Black, Index No. 155262/2021 (Sup. Ct. N.Y. Cty.), with Ms. Ganieva’s personal email address redacted.

I declare under penalties of perjury that the foregoing is true and correct. Executed at Uniondale, New York on January 10, 2022.


Max Gershenoff